



Indiana Department of Education
SUPPORTING STUDENT SUCCESS

Office of Title I Academic Support

June 9, 2008

Dr. John Newby, Superintendent
New Castle Community School Corporation #3445
322 Elliot Street
New Castle, Indiana 47362

Dear Dr. Newby:

On April 28, 2008, the Indiana Department of Education's (IDOE) Title I monitoring team commenced an on-site monitoring review of New Castle Community School Corporation's administration of Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the *No Child Left Behind Act* (NCLB). Enclosed is a report based upon this review.

Prior to, during, and following the on-site monitoring review, the IDOE team conducted a number of activities (described in the attached report) to verify compliance with 1) the programmatic requirements of Title I, Part A; and 2) the fiscal requirements that must be followed by recipients of Title I, Part A educational funds.

The enclosed report summarizes the results of our on-site monitoring review. **Within 30 business days of the date of this letter**, please submit a response, and where appropriate, further documentation. IDOE will review the documentation and determine if it is sufficient to remove or remedy identified compliance problems.

In all cases where there are findings of non-compliance, **New Castle Community School Corporation is responsible for taking appropriate action to remedy compliance deficiencies.** In some instances this can occur immediately and in some instances a longer term solution may be necessary. Where longer-term measures are necessary, New Castle Community School Corporation must submit a specific detailed action plan with timelines and benchmarks for corrective action. IDOE will be happy to provide technical assistance as appropriate.

The IDOE team would like to thank you, Dr. Deborah Hartzler and your staff for their work and assistance provided prior to and during the review in gathering materials and providing access to information in a timely manner.

We look forward to continued cooperation in working with you and your staff members on any follow-up activities and in assisting New Castle Community School Corporation with improving the delivery of Title I services.

Sincerely,

Lee Ann Kwiatkowski, Director
Office of Title I Academic Support
Indiana Department of Education

cc: Dr. Deborah Hartzler, Title I Program Administrator
New Castle Community School Corporation #3445

Ms. Linda Miller, Assistant Superintendent
Center for School and Student Academic Support
Indiana Department of Education

**Indiana Department of Education
Title I, Part A Monitoring**

District: New Castle Community School Corporation

Monitoring Date: April 28, 2008

Monitoring Team: Cindy Hurst, Sarah Pies, Linda Ricketts, Lee Ann Kwiatkowski, Brenda Martz, and Bill Luther

Background Information

The Indiana Department of Education (IDOE) commenced on-site monitoring of New Castle Community School Corporation on April 28, 2008. The purpose of this monitoring visit was to identify areas of strength, areas that need improvement, and areas of non-compliance with Title I, Part A and federal grants management (fiscal) requirements.

IDOE specifically monitored in the following areas:

Monitoring Topic	Statutory Citation
1) Compliance with professional qualification requirements for teachers and paraprofessionals	NCLB §1111(h)(6)(A) NCLB §1119(c)(1) NCLB §9101(23)
2) Compliance with parental involvement requirements	NCLB §1118(a)-(h) NCLB §1111(c)(14) NCLB §1111(d) NCLB §1116(a)(1)(D) NCLB §9101(23)
3) Compliance with school improvement requirements	NCLB §1116(b)(1)(B) NCLB 1116(b)(3) NCLB §1116(c) NCLB §1116(e)
4) Compliance with LEA improvement requirements	NCLB §1116(c)(7)
5) Compliance with schoolwide program requirements	NCLB §1114
6) Compliance with targeted assistance program requirements	NCLB §1115
7) Compliance with school ranking and serving requirements	NCLB §1113
8) Compliance with comparability requirement	NCLB §1120A
9) Compliance with maintenance of effort requirement	NCLB §1120A NCLB §9521

10) Compliance with equitable services to private school students requirements	NCLB §1120
11) Compliance with statutory set-aside requirements	NCLB §1113 NCLB §1116 NCLB §1118
12) Compliance with supplement, not supplant requirements	NCLB §1120A
13) Compliance with financial management/procurement requirements	EDGAR §80.20 EDGAR §80.36
14) Compliance with compensation for personnel services requirements	OMB Circular A-87, Attachment B, Section 8
15) Compliance with complaint procedures	Subpart F—Complaint Procedure (CFR, Title 34)
16) Compliance with equipment and technology requirements	EDGAR §80.32 OMB Circular A-87
17) Compliance with Neglected Institutes	NCLB §1401

During the on-site visit, IDOE spent time interviewing staff from New Castle Community School Corporation at their central office. In addition, IDOE visited two schools, Eastwood Elementary and Parker Elementary, where interviews were conducted with the principals and the Title I staff.

IDOE also reviewed documents from New Castle Community School Corporation, including district policies and procedures, district notices to parents, district plans, school plans, personnel information, budget documents, contracts, and expenditure reports.

Based on the above information, our report follows.

Monitoring Topic 1: Compliance with NCLB Professional Qualification Requirements for Teachers and Paraprofessionals

Background

IDOE interviewed the Title I Program Administrator and two Title I building principals regarding professional qualification requirements. In addition, IDOE reviewed central office and school documentation.

Statutory Requirement: Professional qualifications requirements are contained in Sections 1111 and 1119 of Title I. In addition, "highly qualified" is defined in Section 9101(23) of the general provisions section of NCLB.

Area of Strength:

Professional Qualification Requirements: New Castle Community School Corporation provided evidence that all core academic teachers and instructional paraprofessionals meet the highly qualified requirements, based on a random sampling of teachers and paraprofessionals from Title I schools.

New Castle Community School Corporation participates in a special education co-op with neighboring districts. The LEA did not have documentation on site, but was easily able to locate documentation for special education teachers through the Director of Special Education. All documentation was thorough and accurate and displayed a solid understanding of the highly qualified teacher requirements as they apply to special education teachers.

Areas of Compliance

5% Set-Aside: New Castle Community School Corporation did not reserve 5% of its allocation in 2007-2008 to support assisting teachers in reaching the professional qualification requirements. All teachers in Title I schools are highly qualified, based on a random sampling of teachers and paraprofessionals from Title I schools.

Parents' Right to Know Regarding Non-highly Qualified Teacher: New Castle Community School Corporation did not have any students taught by a teacher for four or more consecutive weeks who was not highly qualified.

Principal Attestation: New Castle Community School Corporation ensured that the principal of every school receiving Title I funds attests annually, in writing, as to whether the school is compliant with the professional qualification requirements of NCLB. As part of the annual Title I application review, grant approval is not given unless each principal has signed the grant attesting that their school is compliant with the professional qualification requirements of NCLB.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 1

Paraprofessionals: New Castle Community School Corporation did not provide evidence that instructional paraprofessionals work under the direct supervision of a highly qualified teacher.

Required Action: New Castle Community School Corporation must ensure that all Title I Instructors are working under the direct supervision of a highly qualified teacher. That means the teacher plans the instructional support activities for the paraprofessional to carry out, evaluates the achievement of the students with whom the paraprofessional is working, and, in particular, that the paraprofessional works in close and frequent proximity to the teacher.

The district must address how it will ensure direct supervision within 30 business days of receipt of this report.

Parents' Right to Know Regarding Request for Teacher Qualifications: New Castle Community School Corporation did not provide evidence that the Parents' Right to Know letter was distributed to all students in Title I buildings. Letters were sent home with students in take-home packets at the beginning of the school year, but no documentation of distribution was kept.

Required Action: New Castle Community School Corporation must ensure that the Parents' Right to Know letter is distributed to all students in Title I buildings, through either a mailing or other systematic method, so that documentation can be provided.

The letter must be distributed to parents for school year 2008-2009. Evidence of distribution must be submitted to IDOE by October 1, 2008.

Monitoring Topic 2: Compliance with Parental Involvement Requirements

Background

IDOE interviewed the Title I Program Administrator and two Title I building principals regarding parental involvement requirements. In addition, IDOE reviewed policies, compacts, and other documentation provided prior to and during the on-site visit.

Statutory Requirement: Parental involvement requirements are contained throughout Title I, specifically in Sections 1111, 1116, and 1118. In addition, parental involvement is defined in Section 9101(23) of the general provisions section of NCLB.

Areas of Compliance

Annual Meeting: New Castle Community School Corporation showed evidence that both Title I schools held an annual meeting for Title I parents during fall 2007.

Parent Information Resource Center (PIRC): New Castle Community School Corporation showed evidence of PIRC information being included in recent newsletters at both Title I schools.

Building Schools' and Parents' Capacity for Strong Parental Involvement: New Castle Community School Corporation showed evidence of building capacity with its Title I parents that matched activities listed in the approved 2007-2008 Title I application.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 2

LEA Parental Involvement Policy: New Castle Community School Corporation did not provide evidence of a district parental involvement policy that included all statutory components (Attachment A). The policy was not developed or revised with parental input, as required in NCLB, nor was there evidence of distribution to parents.

Required Action: New Castle Community School Corporation must ensure that it annually revises its LEA Parental Involvement Policy. Title I parents must be included in the development or revision of the policy. Documentation of such meetings must be kept. The LEA policy must be distributed, through either a mailing or other systematic method, so that documentation can be provided.

The updated policy and evidence of revision to the policy for school year 2008-2009, with Title I parental input, must be provided to IDOE by October 1, 2008.

School Parental Involvement Policy: New Castle Community School Corporation did not show evidence of parental involvement policies for Eastwood Elementary or Parker Elementary that included all statutory components (Attachments B1 and B2). Policies must be developed or revised with Title I parental input and distributed to parents.

Required Action: New Castle Community School Corporation must ensure that both Title I schools develop and annually revise their School Parental Involvement Policies and that all statutory components are included in the policies. Title I parents must be included in the development or revision of those policies. Documentation of such meetings must be kept. School policies must be distributed to parents, through either a mailing or other systematic method, so that documentation can be provided.

Updated policies and evidence of the revision of the policies with Title I parental input for the 2008-2009 school year must be provided to IDOE by October 1, 2008.

School-Parent Compact: New Castle Community School Corporation did not provide evidence of school-parent compacts for either Eastwood Elementary or Parker Elementary that included all statutory components (Attachments C1 and C2). Additionally, there was no involvement of parents with the development/revision or evidence of distribution.

Required Action: New Castle Community School Corporation must ensure that Title I schools annually revise their School-Parent Compacts and that all statutory components are included in the compacts. Title I parents must be included in the development or revision. Documentation of such meetings must be kept. School-parent compacts must be distributed to parents, through either a mailing or a systematic method, so that documentation can be provided.

Updated compacts and evidence of the revision to the policies with Title I parental input for the 2008-2009 school year must be provided to IDOE by October 1, 2008.

Reviews Effectiveness of Parental Involvement Activities: New Castle Community School Corporation did not provide evidence that parental involvement activities are reviewed for effectiveness.

Required Action: New Castle Community School Corporation must develop an evaluation for the effectiveness of the parental involvement activities for the 2008-2009 school year, which may include surveys for parents to complete at the conclusion of a Title I activity.

The district must address the evaluation of parental involvement activities within 30 business days of receipt of this report.

Monitoring Topic 3: Compliance with school improvement, corrective action, restructuring, and alternative governance requirements; including proper implementation of public school Choice and Supplemental Educational Services.

Background

IDOE interviewed the Title I Program Administrator and two Title I building principals regarding school improvement issues. Both Title I served schools visited, Eastwood Elementary and Parker Elementary, are identified for school improvement for the 2007-2008 school year.

Statutory Requirement: School improvement, corrective action, restructuring, and alternative governance requirements, including proper implementation of public school choice and supplemental educational services are contained in Section 1116. Depending on the number of years a school has not made adequate yearly progress (AYP), the school, district, and in certain cases state, must take certain actions.

Areas of Compliance

Notification to Parents: New Castle Community School Corporation provided evidence that IDOE approved school improvement letters regarding school improvement status was mailed to all parents at Eastwood Elementary and Parker Elementary. The Choice letter was mailed in May. A follow-up letter with information on Supplemental Educational Service Providers was mailed in June.

Peer Review: New Castle Community School Corporation provided evidence that school improvement plans were reviewed by a team, including district administrators and three principals from within the district. Principals of the schools in improvement were provided with written feedback on the components of the school improvement plan.

Public School Choice: New Castle Community School Corporation was able to provide evidence that it implemented Public School Choice. Records were kept indicating parents' choices and transfers granted.

Technical Assistance: New Castle Community School Corporation provided evidence that Title I schools in improvement are provided technical assistance.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 3

School Improvement Plans: New Castle Community School Corporation did not provide evidence that Title I schools had school improvement plans that contained all statutory components (Attachments D1 & D2).

Required Action: New Castle Community School Corporation must ensure that school improvement plans are revised for the 2008-2009 school year with all statutory components.

Revised plans must be submitted to IDOE by October 1, 2008.

Supplemental Educational Services (SES): New Castle Community School Corporation provided evidence that services began early in the school year. Multiple notices were sent to parents during the school year.

However, there was no process for verifying that students who enrolled in SES were eligible students.

Additionally, the LEA did not provide evidence that costs related to SES (i.e., provider payment, student PPE) were tracked nor did the LEA require attendance records for participating students prior to payment.

Required Actions: New Castle Community School Corporation must develop a tracking system to: verify the eligibility of students who enroll in SES; track individual costs of tutoring to ensure that students receive the full benefit of services; and monitor provider invoice and payment.

The district must address how it will develop this system for the 2008-2009 school year within 30 days of receipt of this report.

Corrective Action: New Castle Community School Corporation did not provide evidence that corrective action was engaged in a rigorous manner. Eastwood Elementary chose the option to institute and fully implement a new curriculum by adding a new writing program (6+1 Traits). The school also worked with an outside consultant to review data.

Required Action: New Castle Community School Corporation must ensure that corrective actions are planned and implemented in accordance with Section 1116(b)(7)(C)(iv)(I-VI). Eastwood Elementary will enter Year 4, Planning for Restructuring, in school year 2008-2009. The LEA will be required to develop a rigorous restructuring plan, with assistance from IDOE.

Monitoring Topic 4: Compliance with District Improvement Requirements

Background

IDOE interviewed the Title I Program Administrator regarding district improvement requirements.

Statutory Requirement: District (local educational agency) improvement requirements are contained in §1116(c).

Area of Compliance

Notification to Parents: New Castle Community School Corporation provided evidence that the LEA notified parents of its improvement status during the summer of 2007.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 4

LEA Plan Implementation: New Castle Community School Corporation provided evidence that the LEA improvement plan is being implemented. Activities under the plan include ongoing data review and analysis with an outside consultant and identifying

key error patterns. All elementary schools participate, as well as 6th – 7th grade and 8th-9th grade transition teams. However, the plan did not specifically address the needs of student subgroups not making Adequate Yearly Progress (AYP), such as special education.

Recommendation: IDOE recommends that New Castle Community School Corporation develop an LEA improvement plan for 2008-2009 that is more focused on student populations that are not making AYP.

Other Matters for Monitoring Topic 4

LEA Oversight of LEA and School Improvement Requirements: New Castle Community School Corporation is currently identified for LEA improvement, Year 1. Additionally, two of four Title I schools are identified for improvement. All four schools operate schoolwide programs.

Recommendation: IDOE recommends assigning/hiring someone, other than a full-time principal, to oversee the Title I program. New Castle Community School Corporation serves four elementary schools, and all the Title I schools are schoolwide programs. The district and two of the schools are in improvement status. The district is required to provide oversight regarding the development, implementation and evaluation of the LEA, school improvement, and schoolwide plans, which is very hard for a full-time principal to effectively carry out Title I administrative activities, many of which may need to be carried out during the regular school day. Reviewing the data and planning for professional development based on needs is time intensive. The LEA must also meet with school staff to discuss parental involvement and how the LEA can support the schools in implementing parental involvement plans. Supplemental Educational Services also requires administrative oversight. Currently, non-public schools are not participating in Title I. If the non-public school would decide to accept services, this, too, can be time intensive for the district.

Monitoring Topic 5: Compliance with Schoolwide Program Requirements

Background

IDOE interviewed the Title I Program Administrator and the building principals regarding schoolwide program requirements.

Statutory Requirement: The schoolwide program requirements are contained in Section 1114. In general, in an eligible schoolwide program school federal, state, and local funds can be combined to upgrade the entire educational program (except Reading First funds). Unlike a targeted assistance school, where certain students must be

identified for Title I services, in a schoolwide program school all students are considered to be eligible for services and the goal is to upgrade the entire educational program of the school. In addition, in a schoolwide school, schools are not required to maintain separate fiscal records, by program, that identify activities supported with particular funds as long as the school maintains records that demonstrate that the schoolwide program, as a whole, addresses the intent and purposes of each Federal program that was consolidated.

Areas of Compliance

LEA Guidance to Schools: New Castle Community School Corporation provided evidence of LEA guidance to schools regarding the development of schoolwide plans.

Implementation of Schoolwide Plans: New Castle Community School Corporation provided evidence that some evaluation of the plans was conducted, through monthly staff meetings, reviewing student work, and using strategies that are specific and measurable.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 5

Schoolwide Plans: New Castle Community School Corporation provided evidence of schoolwide plans that were developed with parents, but did not contain all required components (Attachments E1 and E2).

Required Action: New Castle Community School Corporation must ensure that schoolwide plans for 2008-2009 school year include all statutory components.

The district must address how it will ensure that all components are included in the schoolwide plans within 30 days of receipt of this report. Revised plans must be submitted to IDOE by October 1, 2008.

Plans must contain all statutory components in order for the school to retain its schoolwide status.

Evaluation of Schoolwide Plans: New Castle Community School Corporation did not provide evidence of an evaluation of schoolwide plans.

Required Action: New Castle Community School Corporation must develop an evaluation of schoolwide plans, to be conducted at least annually, for the 2008-2009 school year.

The district must address evaluation of schoolwide plans within 30 days of receipt of this report.

Monitoring Topic 6: Compliance with Targeted Assistance Program Requirements

Background

New Castle Community School Corporation does not have any Targeted Assistance Title I programs.

Monitoring Topic 7: Compliance with School Ranking and Serving Requirements

Background

IDOE interviewed the Title I Program Administrator regarding the Title I ranking and serving requirements.

Statutory Requirement: The ranking and serving requirements are contained in Section 1113.

Area of Compliance

Ranking and Serving: New Castle Community School Corporation demonstrated compliance with the statutory requirements for ranking and serving schools within the LEA.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 7

None.

Monitoring Topic 8: Compliance with Comparability Requirement

Background

IDOE interviewed the Title I Program Administrator regarding the Title I comparability requirement.

Statutory Requirement: The comparability requirement is contained in Section 1120A.

Area of Compliance

Comparability Report: New Castle Community School Corporation provided evidence that a comparability report was completed for the current school year. The report showed that Title I schools are comparable to non-Title I schools in the district.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 8

None.

Monitoring Topic 9: Compliance with Maintenance of Effort

Background

The Indiana Department of Education conducts yearly review of maintenance of effort for all Title I schools.

Statutory Requirement: The maintenance of effort requirements are contained in Section 1120A of Title I and Section 9521 of the general provisions section of NCLB.

Area of Compliance

New Castle Community School Corporation met compliance with the maintenance of effort requirement in 2006-2007.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 9

None.

Monitoring Topic 10: Compliance with Equitable Services to Private School Students Requirements

Background

New Castle Community School Corporation does not serve any private school students.

Monitoring Topic 11: Compliance with Statutory Set-aside

Background

IDOE interviewed the Title I Program Administrator and the Treasurer regarding the Title I statutory set-aside requirements. Fiscal documents were reviewed prior to and during the onsite visit.

Statutory Requirements: The statutory set-aside requirements are contained throughout Title I, including required reservations for neglected and delinquent children; homeless children, public school choice, supplemental educational services, school improvement, parental involvement and professional development (see Sections 1113, 1116, and 1118).

Areas of Compliance

20 Percent Choice: New Castle Community School Corporation provided evidence of expending funds for Choice-related transportation costs and Supplemental Educational Services in 2006-2007. The LEA was required to reserve an amount up to \$133,828.79 (20% of its 2006-2007 final allocation). The LEA reserved \$43,675.94 and expended \$2,000.00 for SES expenditures.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 11

Homeless students: New Castle Community School Corporation provided evidence that it reserved \$3,000.00 for homeless students in non-Title I schools. Of that amount, \$1,724.25 was expended for textbook-related fees and a Courier-Times kindergarten round-up advertisement.

Required Action: New Castle Community School Corporation must ensure that the set-aside for homeless students is used for appropriate homeless expenditures for school year 2008-2009.

The following resources are available to learn more about serving homeless students with Title I:

- ❑ IDOE McKinney-Vento Homeless webpage:
<http://www.doe.state.in.us/alted/homelesslinkpg.html>
- ❑ Education for Homeless Children and Youth Program:
<http://www.ed.gov/programs/homeless/guidance.doc>

1 Percent Parental Involvement: New Castle Community School Corporation did not provide evidence of expending the full 1% for parental involvement. The LEA was

required to reserve \$6,691.41 of its 2006-2007 allocation for parental involvement activities. The LEA actually set aside \$6,700.00 and expended \$6,443.36.

Additionally, \$1,975.99 worth of expenditures was not appropriate parental involvement expenses. Those expenditures included: printed letterhead, \$119.75; envelopes, \$73.00; ink cartridges, \$139.98; ink, \$239.98; binding, \$31.47; six corkboards, \$129.99/each; Silly Safari Station convocation \$410.00; restaurant, \$28.39; Life Skills Button Award dinners, \$25.50; and Xerox Phaser Printer, \$127.98.

Required Action: New Castle Community School Corporation must ensure that the 1 percent set-aside for parental involvement is budgeted and expended during the 2008-2009 school year.

The district must address how it will monitor the budget and expenditures within 30 days of receipt of this report.

Additionally, IDOE may request documentation throughout the school year to ensure that funds are expended in a timely and appropriate manner.

10 Percent Professional Development for School Improvement New Castle Community School Corporation did not provide evidence of expending the full 10% for professional development for school improvement. Specifically, Eastwood Elementary was required to set aside \$14,088.84 and expended \$13,419.38.

Additionally, several expenditures were not appropriate school improvement expenses. Those expenditures included the Jim "Basketball" Jones Show, classroom supplies (e.g., border, paint, eraser and chalk holders), puzzles, snow glitter, and Happy Birthday pencils.

Required Action: New Castle Community School Corporation must ensure that the 10 percent set-aside for school improvement is budgeted and expended during the 2008-2009 school year.

The district must address how it will monitor the budget and expenditures within 30 days of receipt of this report.

Additionally, IDOE may request documentation throughout the school year to ensure that funds are expended in a timely and appropriate manner.

Monitoring Topic 12: Compliance with Supplement, not Supplant

Background

IDOE interviewed the Title I Program Administrator and the Treasurer regarding the Title I supplement, not supplant requirements. Fiscal documents were reviewed during the onsite visit.

Statutory Requirement: Section 1120A requires Title I funds to supplement, not supplant non-Federal sources of funds.

Areas of Compliance

Schoolwide Program Expenditures: New Castle Community School Corporation provided evidence that Title I expenditures were used to supplement, not supplant the general educational programs.

LEA Guidance on Supplement, Not Supplant: New Castle Community School Corporation provided evidence of sharing IDOE guidance regarding Supplement, Not Supplant regulation with school principals.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 12

None.

Monitoring Topic 13: Compliance with Financial Management/Procurement Requirements

Background

IDOE interviewed the Title I Program Administrator and the Treasurer regarding the financial management system.

Regulatory Requirement: Section 80.20 (b)-(i) of the Education Department General Administrative Regulations (EDGAR) details the threshold requirements financial management systems for non-State grantees (such as school districts).

Areas of Compliance

Audit Findings: New Castle Community School Corporation did not have any audit findings from Indiana State Board of Accounts.

Salaries and Benefits: New Castle Community School Corporation provided evidence that salaries and benefits matched approved staff in 2006-2007.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 13

Process for Internal Control: New Castle Community School Corporation did not provide evidence it has a process for internal control. For example, not all professional development expenditures or parental involvement expenses were appropriate uses of funds (see Monitoring Topic #11).

Required Action: New Castle Community School Corporation must ensure that future Title I purchases are:

1. Approved in the Title I application, and
2. Approved by the Title I Program Administrator.

Expenditures are Reasonable, Allocable, and Necessary: New Castle Community School Corporation did not provide evidence that all 2006-2007 purchases met the requirements for reasonable, allocable, and necessary (see Monitoring Topic #11).

Required Action: New Castle Community School Corporation must ensure that future Title I expenditures fully meet the reasonable, allocable, and necessary requirements.

Monitoring Topic 14: Compliance with Compensation for Personnel Services Requirements

Background

IDOE interviewed the Title I Program Administrator and the Treasurer regarding compensation for personnel services requirements.

Circular Requirement: OMB Circular A-87, Attachment B, Section 8 details the requirements for all compensation for personnel services supported with federal funds. This section includes the time distribution and semi-annual certification requirements.

Area of Compliance

Compensation for Personnel Services Requirements (Semi-annual Certification and Program Activity Reports): New Castle Community School Corporation provided evidence that it was in compliance with the requirements of OMB Circular A-87, Attachment B, Section 8.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 14

None.

Monitoring Topic 15: Compliance with Complaint Procedures

Background

IDOE interviewed the Title I Program Administrator and Treasurer regarding the complaint process.

Areas of Compliance

Complaint Process: New Castle Community School Corporation provided evidence that the district has a complaint procedure. No complaints have been filed.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 15

None.

Monitoring Topic 16: Compliance with Equipment and Technology Requirements (OMB A-87 and EDGAR 80.36)

Background

IDOE interviewed the Title I Program Administrator, the Treasurer, and two Title I building principals regarding equipment acquired with Title I, Part A funds.

Regulatory Requirement: Section 80.36 of the Education Department General Administrative Regulations (EDGAR) details the threshold requirements for the use, management and disposition of equipment acquired with federal funds by non-State grantees (such as school districts).

Areas of Compliance

Inventory List: New Castle Community School Corporation provided evidence that the equipment list contains all components required by EDGAR.

Identification of Equipment: New Castle Community School Corporation provided evidence that equipment purchased with Title I is properly labeled and located where indicated on the inventory sheet.

Disposition of Equipment: New Castle Community School Corporation provided evidence that there was a policy regarding the disposition of equipment.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 16

None.

**Monitoring Topic 17:
Compliance with Neglected Institutions
Funded through Title I, Part A**

Background

New Castle Community School Corporation does not have any neglected institutions funded through Title I, Part A.

LEA Parental Involvement Policy (A)

New Castle Community School Corporation

Local Educational Agency (LEA) Parental Involvement Policy: Sec. 1118 (a) (2) Each LEA shall develop jointly with, agree on with, and distribute to, parents of participating children a written parent involvement policy. The policy shall describe how the agency will:

Parental Involvement Policy Requirements:	
1. Involve parents in the joint development of the plan and the process of school review and improvement	Yes
2. Provide the coordination, technical assistance, and other support necessary to assist participating schools in planning and implementing effective parent involvement activities to improve student academic achievement and school performance	Yes
3. Build the schools' and parents' capacity for strong parental involvement by <ul style="list-style-type: none"> <input type="checkbox"/> Providing assistance to parents of children served as appropriate, in understanding such topics as the State's academic content standards and student academic achievement standards, and how to monitor a child's progress and work with educators to improve the achievement of their children <input type="checkbox"/> Providing materials and training to help parents to work with their children to improve their children's achievement, such as literacy training and using technology, as appropriate to foster parental involvement <input type="checkbox"/> Educate educators with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school <input type="checkbox"/> Ensure that information related to school and parent programs, meetings, and other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children, to the extent practicable, is in a language that parents can understand <input type="checkbox"/> Other reasonable support for parental involvement activities under section 1118 as parents may request 	No
4. Coordinate and integrate parental involvement strategies under Title I with strategies under other programs such as Head Start, Reading First, Early Reading First, Even Start, Parents as Teachers, and Home Instruction Program for Preschool Youngsters, and State-run preschool programs	No
5. Conduct, with the involvement of parents, an annual evaluation of the content and effectiveness of the parental involvement policy in improving the academic quality of the schools served under this part, including identifying barriers to greater participation by parents in activities (with particular attention to parents who are economically disadvantaged, are disabled, have limited English proficiency, have limited literacy, or are of any racial or ethnic minority background) and use the findings of such evaluation to design strategies for more effective parental involvement, and to revise, if necessary, the parental involvement policies	Yes
6. Involve parents in the activities of the schools served under Title I	Yes

School Parent Involvement Policy Checklist (B1)

Eastwood Elementary School

School Parental Involvement Policy: Section 1118 (b) Each Title I school shall jointly develop with, and distribute to, parents of participating children a written parental involvement policy, agreed on by such parents, that shall describe the means for carrying out the following requirements listed below.

Requirements of School Parental Involvement Policy	
1. Convened an annual meeting at a convenient time, to which all parents of participating children shall be invited and encouraged to attend, to inform parents of their school's participation in Title I, Part A, and to explain the requirement of such and the right of the parents to be involved	
2. Offered a flexible number of meetings, such as meetings in the morning or evening, and may provide, with funds provided under this part, transportation, child care, or home visits, as such services relate to parental involvement	
3. Involve parents, in an organized, ongoing, and timely way, in the planning, review, and improvement of programs under this part, including the planning, review, and improvement of the school parental involvement policy	
4. Provide parents with: <ul style="list-style-type: none"> <input type="checkbox"/> Provide timely information about Title I programs <input type="checkbox"/> A description and explanation of the curriculum in use at the school, the forms of academic assessment used to measure student progress, and the proficiency levels students are expected to meet <input type="checkbox"/> If requested by parents, opportunities for regular meetings to formulate suggestions and to participate, as appropriate, in decisions relating to the education of their children, and respond to any such suggestions as soon as practicably possible 	
5. (SWP schools) If the schoolwide program plan under section 1114(b)(2) is not satisfactory to the parents of participating children, submit any parent comments on the plan when the school makes the plan available to the LEA	Yes
6. Includes a School-Parent Compact (see checklist next page)	Yes
7. Build the schools' and parents' capacity for strong parental involvement by: <ul style="list-style-type: none"> <input type="checkbox"/> Providing assistance to parents of children served as appropriate, in understanding such topics as the State's academic content standards and student academic achievement standards, and how to monitor a child's progress and work with educators to improve the achievement of their children <input type="checkbox"/> Providing materials and training to help parents work with their children to improve their children's achievement, such as literacy training and using technology, to foster parental involvement <input type="checkbox"/> Coordinating and integrating parent involvement programs and activities with Head Start, Early Reading First, Even Start, the Home Instruction Programs for Preschool Youngsters, the Parents as Teachers Program, and public preschool, and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children <input type="checkbox"/> Educate educators with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school <input type="checkbox"/> Ensure that information related to school and parent programs, meetings, and other activities, are sent to the parents of participating children in a format and, to the extent practicable, in a language the parents can understand <input type="checkbox"/> Other reasonable support for parental involvement activities as parents may request 	

This policy is not specific to the school.

School Parent Involvement Policy Checklist (B2)

Parker Elementary School

School Parental Involvement Policy: Section 1118 (b) Each Title I school shall jointly develop with, and distribute to, parents of participating children a written parental involvement policy, agreed on by such parents, that shall describe the means for carrying out the following requirements listed below.

Requirements of School Parental Involvement Policy	
1. Convened an annual meeting at a convenient time, to which all parents of participating children shall be invited and encouraged to attend, to inform parents of their school's participation in Title I, Part A, and to explain the requirement of such and the right of the parents to be involved	No Need specific date and time
2. Offered a flexible number of meetings, such as meetings in the morning or evening, and may provide, with funds provided under this part, transportation, child care, or home visits, as such services relate to parental involvement	See Above
3. Involve parents, in an organized, ongoing, and timely way, in the planning, review, and improvement of programs under this part, including the planning, review, and improvement of the school parental involvement policy	Strengthen
4. Provide parents with: a. Provide timely information about Title I programs b. A description and explanation of the curriculum in use at the school, the forms of academic assessment used to measure student progress, and the proficiency levels students are expected to meet c. If requested by parents, opportunities for regular meetings to formulate suggestions and to participate, as appropriate, in decisions relating to the education of their children, and respond to any such suggestions as soon as practicably possible	A. No B. No C. No
5. (SWP schools) If the schoolwide program plan under section 1114(b)(2) is not satisfactory to the parents of participating children, submit any parent comments on the plan when the school makes the plan available to the LEA	No
6. Includes a School-Parent Compact (see checklist next page)	YES
7. Build the schools' and parents' capacity for strong parental involvement by: <input type="checkbox"/> Providing assistance to parents of children served as appropriate, in understanding such topics as the State's academic content standards and student academic achievement standards, and how to monitor a child's progress and work with educators to improve the achievement of their children <input type="checkbox"/> Providing materials and training to help parents work with their children to improve their children's achievement, such as literacy training and using technology, to foster parental involvement <input type="checkbox"/> Coordinating and integrating parent involvement programs and activities with Head Start, Early Reading First, Even Start, the Home Instruction Programs for Preschool Youngsters, the Parents as Teachers Program, and public preschool, and conduct other activities, such as parent resource centers, that encourage and support parents in more fully participating in the education of their children <input type="checkbox"/> Educate educators with the assistance of parents, in the value and utility of contributions of parents, and in how to reach out to, communicate with, and work with parents as equal partners, implement and coordinate parent programs, and build ties between parents and the school <input type="checkbox"/> Ensure that information related to school and parent programs, meetings, and other activities, are sent to the parents of participating children in a format and, to the extent practicable, in a language the parents can understand <input type="checkbox"/> Other reasonable support for parental involvement activities as parents may request	A. No B. No C. No D. No E. No F. No

This policy is not specific to the school.

School – Parent Compact Checklist (C1)

Eastwood Elementary School

School-Parent Compacts: As a component of the school-level parental involvement policy, each Title I school shall jointly develop with parents for all children served, a school-parent compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve the State's high standards. Such compact shall:

School-Parent Compact shall include:	
1. Describe the school's responsibility to provide high-quality curriculum and instruction in a supportive and effective learning environment that enables the children served under this part to meet the State's student academic achievement standards, and the ways in which each parent will be responsible for supporting their children's learning, such as monitoring attendance, homework completion, and television watching; volunteering in their child's classroom; and participating, as appropriate, in decisions relating to the education of their children and positive use of extracurricular time; and	No
2. Address the importance of communication between teachers and parents on an ongoing basis through, at a minimum: <ul style="list-style-type: none"> <input type="checkbox"/> Parent-teacher conferences in elementary school, at least annually, during which the compact shall be discussed as the compact relates to the individual child's achievement <input type="checkbox"/> Frequent reports to parents on their children's progress <input type="checkbox"/> Reasonable access to staff, opportunities to volunteer and participate in their child's class, and observation of classroom activities 	No

School – Parent Compact Checklist (C2)

Parker Elementary School

School-Parent Compacts: As a component of the school-level parental involvement policy, each Title I school shall jointly develop with parents for all children served, a school-parent compact that outlines how parents, the entire school staff, and students will share the responsibility for improved student academic achievement and the means by which the school and parents will build and develop a partnership to help children achieve the State's high standards. Such compact shall:

School-Parent Compact shall include:	
1. Describe the school's responsibility to provide high-quality curriculum and instruction in a supportive and effective learning environment that enables the children served under this part to meet the State's student academic achievement standards, and the ways in which each parent will be responsible for supporting their children's learning, such as monitoring attendance, homework completion, and television watching; volunteering in their child's classroom; and participating, as appropriate, in decisions relating to the education of their children and positive use of extracurricular time; and	No
2. Address the importance of communication between teachers and parents on an ongoing basis through, at a minimum: <ul style="list-style-type: none"> <input type="checkbox"/> Parent-teacher conferences in elementary school, at least annually, during which the compact shall be discussed as the compact relates to the individual child's achievement <input type="checkbox"/> Frequent reports to parents on their children's progress <input type="checkbox"/> Reasonable access to staff, opportunities to volunteer and participate in their child's class, and observation of classroom activities 	No

School Improvement Plan Checklist (D1)

Eastwood Elementary School

According to Sec. 1116 (b) (3) (A), after identification as a school in improvement, each school identified as in improvement shall, not later than 3 months after being so identified, develop or revise a school plan in consultation with parents, school staff, the LEA, and outside experts, for approval by such LEA. The school plan shall cover a 2-year period and include:

Ten Components of School Improvement Plan*:	
1. Strategies based on scientifically based research strategies to strengthen core academic subjects that addresses the specific academic issues that caused the school to be identified for school improvement	Does not address Spec. Ed. English or Math
2. Policies and practices concerning core academic subjects that have the greatest likelihood that all groups of students will meet the proficient level on the ISTEP+	Strengthen
3. Assurance that the school will spend not less than 10% each year to provide high quality professional development that: <ul style="list-style-type: none"> <input type="checkbox"/> Directly address the academic achievement problem that caused the school to be identified <input type="checkbox"/> Meets NCLB's professional development requirements <input type="checkbox"/> Provides increased opportunity for participating in professional development 	Add pages 14-15 (professional development and budget) from application
4. Specifies how professional development funds will be used to remove the school from improvement status	Strengthen
5. Annual measurable objectives for continuous and substantial progress by each group of students to meet proficient levels of achievement on the ISTEP+ (by 2013-2014)	Should include data broken into subgroups
6. Documentation that written notice about the identification of a school in improvement was provided to the parents of each student enrolled in the school in a language parents can understand.	Include school improvement letter
7. Specifies the responsibilities of the school, the LEA, and the SEA including technical assistance to be provided	Strengthen
8. Strategies to promote effective parental involvement in the school	Strengthen
9. Activities before and after school, during summer, and during any extension of the school year	
10. Incorporates a teacher-mentoring program (in addition to any the LEA might offer for new teachers)	No formal mentoring program

*Consolidated plans are encouraged and accepted

School Improvement Plan Checklist (D2)

Parker Elementary School

According to Sec. 1116 (b) (3) (A), after identification as a school in improvement, each school identified as in improvement shall, not later than 3 months after being so identified, develop or revise a school plan in consultation with parents, school staff, the LEA, and outside experts, for approval by such LEA. The school plan shall cover a 2-year period and include:

Ten Components of School Improvement Plan*:	
1. Strategies based on scientifically based research strategies to strengthen core academic subjects that addresses the specific academic issues that caused the school to be identified for school improvement	No
11. Policies and practices concerning core academic subjects that have the greatest likelihood that all groups of students will meet the proficient level on the ISTEP+	No
12. Assurance that the school will spend not less than 10% each year to provide high quality professional development that: <ul style="list-style-type: none"> <input type="checkbox"/> Directly address the academic achievement problem that caused the school to be identified <input type="checkbox"/> Meets NCLB's professional development requirements <input type="checkbox"/> Provides increased opportunity for participating in professional development 	No – add pages 14 and 15 (professional development and budget) to the plan
13. Specifies how professional development funds will be used to remove the school from improvement status	Strengthen – add schedule for year
14. Annual measurable objectives for continuous and substantial progress by each group of students to meet proficient levels of achievement on the ISTEP+ (by 2013-2014)	Yes
15. Documentation that written notice about the identification of a school in improvement was provided to the parents of each student enrolled in the school in a language parents can understand.	Add school improvement letter
16. Specifies the responsibilities of the school, the LEA, and the SEA including technical assistance to be provided	Yes
17. Strategies to promote effective parental involvement in the school	No
18. Activities before and after school, during summer, and during any extension of the school year	Yes
19. Incorporates a teacher-mentoring program (in addition to any the LEA might offer for new teachers)	Yes

*Consolidated plans are encouraged and accepted

Title I Schoolwide Plan Checklist (E1)

Eastwood Elementary School

Section 1114 (b) (2) Any school that operates a schoolwide program shall first develop (or amend a plan for such a program that was in existence on the day before the date of enactment of the NCLB Act of 2001), in consultation with the LEA and its school support team or other technical assistance provider under section 1117, a comprehensive plan for reforming the total instructional program in the school that:

- i. Describes how the school will implement the components described below
- ii. Describes how the school will use resources under this part and other sources to implement the components
- iii. Includes a list of SEA programs and other federal programs that will be consolidated in the schoolwide program
- iv. Describes how the school will provide individual student academic assessment results in a language the parents can understand, including an interpretation of those results, to the parents of a child who participates in the academic assessments required by the SEA plan.

Components of a Schoolwide Plan*:	Found on Page #:
1. A comprehensive needs assessment of the whole school	Yes
2. Implementation of schoolwide reform strategies that: <ol style="list-style-type: none"> a. Provide opportunities for all children to meet proficient and advanced levels of student academic achievement a. Use effective methods and instructional strategies that are based on scientifically based research that: <ol style="list-style-type: none"> c. Strengthens the core academic program d. Increases the amount of learning time <ol style="list-style-type: none"> 1. Includes strategies for serving underserved populations 2. Includes strategies to address the needs of all children in the school, but particularly low achieving children and those at risk of not meeting state standards 3. Address how the school will determine if those needs of the children have been met h. Are consistent with and are designed to implement state and local improvement plans, if any 	<ol style="list-style-type: none"> a. Yes b. Yes c. Yes d. Strengthen e. Strengthen f. Strengthen g. No h. Strengthen
3. Highly qualified teachers in all core content area classes	Yes
4. High quality and on-going professional development for teachers, principals, and paraprofessionals	Strengthen
5. Strategies to attract high-quality, highly qualified teachers to this school	Strengthen
6. Strategies to increase parental involvement, such as literary services	Strengthen
6 a. Description how the school will provide individual academic assessment results to parents	Yes
6 b. Strategies to involve parents in the planning, review, and improvement of the schoolwide plan	Strengthen
7. Plans for assisting preschool children in the transition from early childhood programs such as Head Start, Even Start, Early Reading First, or a state-run preschool program	Yes
8. Opportunities and expectations for teachers to be included in the decision making related to the use of academic assessment results leading to the improvement of student achievement	No
9. Activities and programs at the school level to ensure that students having difficulty mastering proficient and advanced levels of the academic achievement are provided with effective, timely additional assistance	Strengthen
10. Coordination and integration of federal, state and local funds; and resources such as in-kind services and program components	Yes
10 a. A list of programs that will be consolidated under the schoolwide plan (if applicable)	Yes

*Consolidated plans are encouraged and accepted

Title I Schoolwide Plan Checklist (E2)

Parker Elementary School

Section 1114 (b) (2) Any school that operates a schoolwide program shall first develop (or amend a plan for such a program that was in existence on the day before the date of enactment of the NCLB Act of 2001), in consultation with the LEA and its school support team or other technical assistance provider under section 1117, a comprehensive plan for reforming the total instructional program in the school that:

- v. Describes how the school will implement the components described below
- vi. Describes how the school will use resources under this part and other sources to implement the components
- vii. Includes a list of SEA programs and other federal programs that will be consolidated in the schoolwide program
- viii. Describes how the school will provide individual student academic assessment results in a language the parents can understand, including an interpretation of those results, to the parents of a child who participates in the academic assessments required by the SEA plan.

Components of a Schoolwide Plan*:	Found on Page #:
1. A comprehensive needs assessment of the whole school	Yes
2. Implementation of schoolwide reform strategies that: <ul style="list-style-type: none"> a. Provide opportunities for all children to meet proficient and advanced levels of student academic achievement a. Use effective methods and instructional strategies that are based on scientifically based research that: <ul style="list-style-type: none"> c. Strengthens the core academic program d. Increases the amount of learning time e. Includes strategies for serving underserved populations f. Includes strategies to address the needs of all children in the school, but particularly low achieving children and those at risk of not meeting state standards g. Address how the school will determine if those needs of the children have been met h. Are consistent with and are designed to implement state and local improvement plans, if any 	<ul style="list-style-type: none"> a. Yes b. No c. Yes d. Yes e. Strengthen f. Yes g. Yes h. Yes
3. Highly qualified teachers in all core content area classes	Yes
4. High quality and on-going professional development for teachers, principals, and paraprofessionals	Yes
5. Strategies to attract high-quality, highly qualified teachers to this school	Yes
6. Strategies to increase parental involvement, such as literary services	No
6 a. Description how the school will provide individual academic assessment results to parents	No
6 b. Strategies to involve parents in the planning, review, and improvement of the schoolwide plan	Yes
7. Plans for assisting preschool children in the transition from early childhood programs such as Head Start, Even Start, Early Reading First, or a state-run preschool program	No
8. Opportunities and expectations for teachers to be included in the decision making related to the use of academic assessment results leading to the improvement of student achievement	Yes
9. Activities and programs at the school level to ensure that students having difficulty mastering proficient and advanced levels of the academic achievement are provided with effective, timely additional assistance	Yes
10. Coordination and integration of federal, state and local funds; and resources such as in-kind services and program components	Yes
10 a. A list of programs that will be consolidated under the schoolwide plan (if applicable)	Yes